



1870 Starkey Road Suite 2 Largo, FL 33771
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March 12, 2012

US District Judge William F Kuntz
Magistrate Judge Lois Bloom
United States District Court
Eastern District Court of New York
225 Cadman Plaza East

Brooklyn, NY 11201

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
MAR 22 2012
3pm
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BROOKLYN OFFICE

Re: **Shirley Wrubel, as Trustee of the Sara Hollander Irrevocable Life Insurance Trust v. John Hancock Life Insurance Company,**
Docket No. 11-cv-01873 (WKF) (LB)

Dear Magistrate Judge Bloom:

We, Reliable Reporting Services, Inc. ("RRS"), are representing ourselves as a non-party in the case noted above. We have been subpoenaed by the attorney of the plaintiff in this case. We respectfully request this Court quash the subpoena under Rule 45(c)(3)(A)(ii) of the Federal Rules of Civil Procedure. The subpoena commanded we produce documents and to appear for deposition at the offices of Lipsius-BenHaim Law LLP in Kew Gardens, New York. As our office is located at 1870 Starkey Road Suite #2 Largo Florida 33771, this places us well outside of the 100 mile limit.

In addition to the above request please note, although we did previously perform services for the defendant John Hancock Life Insurance Company ("John Hancock"), we did not provide any services to John Hancock in respect to the applications for insurance for Sara Hollander or any persons defined under Schedule A of the subpoena. Any information John Hancock received and used in the determination for insuring Sara Hollander was not received from RRS. RRS has ceased in providing services to John Hancock as of October of 2009.

Respectfully submitted,

Nancy Wright

Nancy Wright
President

Reliable Reporting Services, Inc.



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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Affirmation of Service

Wrubel v. John Hancock

Civil Action No. 11-cv-01873 (WFK) (LB)

I, Nancy Wright, declare under penalty of perjury, certify that a copy of the attached motion to quash was served by United States Postal Service first class mail, on March 12, 2012 upon:

David BenHaim Esq., Lipsius-BenHaim Law LLP
80-02 Kew Gardens Road Suite 1030
Kew Gardens, NY 11415

Dated: March 12, 2012

Nancy Wright

Nancy Wright
President

Reliable Reporting Services, Inc.
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RELIABILITY

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